

State Water Resources Control Board

July 8, 2016

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8019 7467

Mr. Rene Villa-Agustin, Director
Fuel Services & Environmental Compliance
Department of General Services
City of Los Angeles
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SUBJECT: UNLEADED UNDERGROUND STORAGE TANK SYSTEM LOCATED AT CITY OF LOS ANGELES, DEPARTMENT OF GENERAL SERVICES, CITY HALL SOUTH, 111 EAST FIRST STREET, LOS ANGELES

Dear Mr. Villa-Agustin:

The State Water Resources Control Board (State Water Board) is in receipt of the City of Los Angeles, Department of General Services' (GSD) May 23, 2016 response regarding ongoing Violation 11 Failure to Monitor Product Piping as originally noted in our Notice of Violation (NOV) dated October 28, 2015. This ongoing violation pertains to the unleaded product piping contained in a fireproof tray that is not monitored.

In its response, GSD explained that after conferring with the Certified Unified Program Agency (CUPA), Los Angeles City Fire Department (LACFD), a solution was developed that would allow the system to be monitored. GSD explained that in addition to the fireproof tray being perforated, thereby allowing for immediate visual detection of a leak, sensors were installed in the tray area. Additionally, GSD proposed the following measures to ensure that the tank system is safely monitored: remote monitoring of the tank system using the automated tank gauging system and utilizing existing monitoring equipment to provide sudden loss alarms.

Because of GSD's effort to be compliant with the monitoring requirements, the State Water Board intends to use its discretion and not initiate an enforcement action regarding this violation. In addition to the measures GSD has taken, the State Water Board will require:

- Tray sensors that continuously monitor the piping, activate an audible and visual alarm, and stop the flow of product at the turbine when a leak is detected;
- Installation of an electronic line leak detector (ELLD) capable of detecting a release of 3.0 gallons per hour (gph). The ELLD must shut off the turbine when a release is detected or the ELLD fails or is disconnected. Due to the anti-syphon valve located in the turbine sump, the ELLD will need to be properly placed so it is capable of testing the entire product line from the turbine to the farthest dispenser. Additionally, the ELLD shall perform and provide at minimum one passing 0.2 gph monthly line test at normal operating

pressure, and the line test results will be noted on the monthly designated operator report; and,

- All leak detection equipment must be certified for operability annually, documented on an "Annual Monitoring System Certification Form," and each device must be tagged at the time of certification, pursuant to California Code of Regulations, title 23, section 2638. This additional monitoring requirement must be identified in the underground storage tank (UST) operating permit issued by LACFD, and the monitoring plan approved by LACFD.

This determination only applies to the State Water Board's use of discretion in bringing an enforcement action concerning Violation 11 Failure to Monitor Product Piping as originally noted in our NOV letter dated October 28, 2015. Nothing in this letter should be construed as precluding the State Water Board from exercising any other enforcement authority it may have and extends only for as long as GSD maintains compliance with the other UST requirements found in chapter 6.7 of the Health and Safety Code and chapter 16 of title 23, California Code of Regulations. Finally, this letter does not restrict any other state, local, or federal agency with jurisdiction over the USTs from exercising its enforcement authority, including authority to seek criminal, civil, or administrative remedies for the violations described herein.

If you have any questions, please contact me at (916) 341-5551, or by email at Amantha.Henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: See next page.

cc: *(via email only)*

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